

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

TAMELA WINGARD,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	2:06-CV-604-WKW
)	
SPRINT CORPORATION, successor to)	
U.S. UNWIRED, INC.)	
)	
Defendant.)	

UNOPPOSED MOTION TO EXTEND DEADLINE
FOR DISPOSITIVE MOTIONS

Defendant U.S. Unwired, Inc. ("U.S. Unwired"), which is incorrectly identified in the Complaint as "Sprint Corporation, successor to U.S. Unwired, Inc.," moves the Court to extend the deadline for dispositive motions by thirty days, and as grounds therefore states as follows:

1. Pursuant to the Court's Uniform Scheduling Order of August 25, 2006, the deadline for dispositive motions is currently January 30, 2007.
2. The parties are currently engaged in settlement discussions, and believe that those discussions would be enhanced by an extension of the dispositive motion deadline. Specifically, an extension of the dispositive motion deadline would allow the parties an opportunity to explore the possibility of settlement before U.S. Unwired incurs the significant costs and attorney's fees associated with the preparation of a summary judgment and brief. Additionally, the parties had scheduled out of state depositions, which should be taken prior to the filing of a dispositive motion, for January 22, 2007.

An extension of the dispositive motion deadline would allow the parties to postpone costly out of state depositions pending settlement negotiations.

3. This case is scheduled for a pretrial conference on May 30, 2007. The requested extension would still provide for a dispositive motion deadline that is 90 days prior to the scheduled pretrial conference.

4. The deadline for discovery is April 30, 2007. The requested extension would not necessitate a continuance of this or any other deadline provided in the Uniform Scheduling Order of August 25, 2006.

5. Counsel for Plaintiff Tamela Wingard has authorized the undersigned to represent to the Court that he agrees with the need for an extension of the dispositive motion deadline and does not oppose this motion.

WHEREFORE Defendant U.S. Unwired respectfully requests that the Court grant this motion and extend the deadline for dispositive motions by thirty days, to March 1, 2007.

s/Jennifer F. Swain

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One of the Attorneys for Defendant,
U.S. Unwired, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2007 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Jay Lewis, Esq.
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s/Jennifer F. Swain

Jennifer F. Swain (ASB-7761-I67J)
One of the Attorneys for Defendant,
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